1 2	RANDALL S. LUSKEY (SBN: 240915) rluskey@paulweiss.com PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP					
3	535 Mission Street, 24th Floor San Francisco, CA 94105					
4	Telephone: (628) 432-5100 Facsimile: (628) 232-3101					
5	ROBERT ATKINS ( <i>Pro Hac Vice</i> admitted)					
6	ratkins@paulweiss.com CAITLIN E. GRUSAUSKAS ( <i>Pro Hac Vice</i> admitted)					
7	cgrusauskas@paulweiss.com ANDREA M. KELLER ( <i>Pro Hac Vice</i> admitted)					
8	akeller@paulweiss.com PAUL, WEISS, RIFKIND, WHARTON					
9	& GARRISON LLP 1285 Avenue of the Americas					
10	New York, NY 10019 Telephone: (212) 373-3000					
11	Facsimile: (212) 757-3990					
12	Attorneys for Defendants UBER TECHNOLOGIES, INC.;					
13	RASIER, LLC; and RASIER-CA, LLC					
<ul><li>14</li><li>15</li></ul>	[Additional Counsel Listed on Signature Page]					
16	UNITED STATES DISTRICT COURT					
17 18	NORTHERN DISTRICT OF CALIFORNIA					
19	SAN FRA	NCISCO DIVISION				
20	IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT	Case No. 3:23-md-03084-CRB				
21	LITIGATION	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR				
22	This Document Relates to:	DEFENDANTS UBER TECHNOLOGIES, INC. AND RAISER, LLC TO PROVIDE				
23	ALL ACTIONS	CERTAIN PRIVILEGE LOGS				
24		Judge: Hon. Lisa J. Cisneros Courtroom: G – 15th Floor				
25						
26						
27						
28						

Case No. 3:23-MD-3084-CRB

STIPULATION AND [PROPOSED] ORDER

## **STIPULATION**

**WHEREAS**, on November 27, 2024, this Court entered an order (the "Order") requiring Defendants Uber Technologies, Inc. and Raiser, LLC ("Defendants") to review certain privilege log entries and provide an updated privilege log by December 11, 2024. (ECF 1908).

**WHEREAS**, the parties have met and conferred, and have agreed that Defendants should be permitted a brief extension of the December 11 deadline for Defendants to update the privilege log for tranche one custodians.

**WHEREAS**, specifically the parties have agreed that Defendants may have an additional 1 day, until December 12, 2024, to update the privilege log for tranche one custodians.

**WHEREFORE**, the parties respectfully request that the Court enter the parties' stipulation that: the Order's December 11, 2024 deadline for Defendants to update the privilege log for tranche one custodians is extended to December 12, 2024.

## IT IS SO STIPULATED

1	DATED: December 11, 2024	SHOOK HARDY & BACON L.L.P.
2		By: <u>/s/_ Michael B. Shortnacy</u> MICHAEL B. SHORTNACY
3		
4		MICHAEL B. SHORTNACY (SBN: 277035) mshortnacy@shb.com
5		SHOOK, HARDY & BACON L.L.P. 2121 Avenue of the Stars, Suite 1400
6		Los Angeles, CA 90067 Telephone: (424) 285-8330 Facsimile: (424) 204-9093
7		PATRICK OOT (Admitted <i>Pro Hac Vice</i> )
8		oot@shb.com SHOOK, HARDY & BACON L.L.P. 1800 K St. NW Ste. 1000
9 10		Washington, DC 20006 Telephone: (202) 783-8400 Facsimile: (202) 783-4211
11		
12		KYLE N. SMITH ( <i>Pro Hac Vice</i> admitted) ksmith@paulweiss.com
13		JESSICA E. PHILLIPS ( <i>Pro Hac Vice</i> admitted) jphillips@paulweiss.com
14		PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
15		2001 K Street, NW Washington DC, 20006
16		Telephone: (202) 223-7300 Facsimile: (202) 223-7420
17		Attorney for Defendants UBER TECHNOLOGIES, INC.,
18		RASIER, LLC, and RASIER-CA, LLC
19		
20	DATED: December 11, 2024	By: /s/ Sarah R. London
21		Sarah R. London LIEFF CABRASER HEIMANN &
22		BERNSTEIN 275 Battery Street, Fl. 29
23		San Francisco, CA 94111 Telephone: (415) 956-1000
24		slondon@lchb.com
25		By: /s/_Rachel B. Abrams Rachel B. Abrams
26		PEIFFER WOLF CARR KANE CONWAY & WISE, LLP
27 28		555 Montgomery Street, Suite 820 San Francisco, CA 94111 Telephone: (415) 426-5641 rabrams@peifferwolf.com
20		3
	STIPULATION AND [PROPOSED] ORDER	Case No. 3:23-MD-3084-CRB

	Case 3:23-md-03084-CRB Document 1944 Filed 12/11/24 Page 4 of 5						
1	Ry: /s/ Roonal P. Luhana						
2	By: <u>/s/ Roopal P. Luhana</u> Roopal P. Luhana <b>CHAFFIN LUHANA LLP</b>						
3	600 Third Avenue, Fl. 12 New York, NY 10016 Telephone: (888) 480-1123 luhana@chaffinluhana.com						
4							
5							
6	Co-Lead Counsel for Plaintiffs						
7							
8							
9	EH EDIS ATTESTATION						
10	FILER'S ATTESTATION						
11	I, Michael B. Shortnacy, am the ECF User whose ID and password are being used to file this						
12	document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatorie						
13	identified above has concurred in this filing.						
14	/r/ Michael D. Chautuna.						
15	/s/ <u>Michael B. Shortnacy</u> MICHAEL B. SHORTNACY						
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	4						
	STIPULATION AND [PROPOSED] ORDER  Case No. 3:23-MD-3084-CRB						

	Case 3:23-md-03084-CRB Docume	ent 1944	Filed 12/11/24	Page 5 of 5			
1							
2							
3							
4							
5	HNITED ST.	ATEC DIC	TDICT COUDT				
6	UNITED STATES DISTRICT COURT						
7	NORTHERN DISTRICT OF CALIFORNIA						
8			DIVISION				
9	IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT		No. 3:23-md-03084				
10	LITIGATION	STIP		NDING TIME FOR			
11	This Document Relates to:	INC.	AND RAISER, LL	FECHNOLOGIES, C TO PROVIDE			
12	ALL ACTIONS	PRIVILEGE LOGS					
13 14							
15	PURSUANT TO STIPULATION, I	T SO ORI	DERED:				
16	The Stipulation Extending Time for Defendants Uber Technologies, Inc. and Raiser, LLC						
17	("Defendants") to Provide Privilege Logs is <b>GRANTED</b> .						
18	2. The December 11, 2024 deadline	C		vilege logs for tranche one			
19	custodians (ECF 1908) is extended t	to Decemb	er 12, 2024.				
20	PURSUANT TO STIPULATION,	IT IS SO	ORDERED.				
21							
22	DATED: December, 2024						
23			A J. CISERNOS ted States Magistrat	e Judge			
24							
25							
26							
27							
28							
	STIPULATION AND [PROPOSED] ORDER	5	Case	No. 3:23-MD-3084-CRB			